

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

2014 JUL 16 PM 2:30

UNITED STATES OF AMERICA

v.

CRIMINAL NO.

RAJEANNA JENNE BROWN

3 - 14 CR - 276 - M
FACTUAL RESUME

PLEA:

Information, Count One:
Prostitution Near a Military Establishment
Violation of 18 U.S.C. § 1384

PENALTY:

The maximum penalties the Court can impose for Count One of the Information include:

- a. imprisonment for a period of not more than one year;
- b. fine not to exceed \$100,000 or twice any pecuniary gain to Defendant or loss to the victims;
- c. a term of supervised release of not more than one year, which may follow any term of imprisonment. If Defendant violates the conditions of supervised release, she could be imprisoned for the entire term of supervised release;
- d. a mandatory special assessment of \$25;
- e. restitution to victims or to the community, which may include restitution arising from all relevant conduct, not limited to that arising from the offense of conviction alone; and
- f. costs of incarceration and supervision.

ELEMENTS OF
THE OFFENSE:

In order to establish the guilt of Defendant for Count One of the Information, a violation of 18 U.S.C. § 1384, Prostitution Near a Military Establishment, the Government must prove each of the following elements beyond a reasonable doubt:

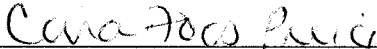
- First: That the defendant knowingly engaged in prostitution within a reasonable distance of a military camp, station, fort, base or training facility; and
- Second: That the Secretary of the Army, Navy or Air Force determined that the the camp, station, fort, base or training facility was needful to the efficiency, health and welfare of the Army, Navy or Air Force.

STIPULATED FACTS:

Rajeanna Brown admits that on or about February 27, 2014, she knowingly engaged in prostitution at a Motel 6 located near Northwest Highway and Interstate 35E in Dallas, Texas. Brown further admits that the Motel 6 is located approximately two miles from the Texas National Guard Armory located at 1175 California Crossing Road, Dallas, Texas 75220, and the Texas National Guard Armory is a training facility that the Secretary of the Army determined is needful to the efficiency, health and welfare of the Army. Finally, both the Motel 6 and the Texas National Guard Armory are located in Dallas Division of the Northern District of Texas.

Accordingly, Rajeanna Brown admits that on or about February 27, 2014 in the Dallas Division of the Northern District of Texas she knowingly engaged in prostitution within a reasonable distance of a military training facility that the Secretary of the Army

determined was needful to the efficiency, health and welfare of the Army in violation of
18 U.S.C. § 1384.



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7/16/14

Date



RAJEANNA JENNE BROWN

Defendant

7-11-14

Date



LAUREN WOODS

Attorney for the Defendant

7/11/14

Date